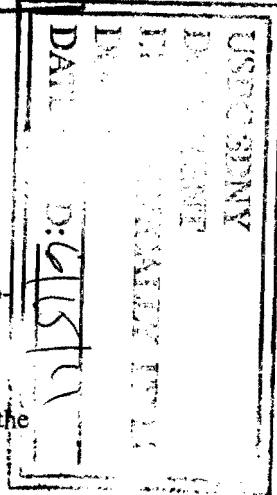
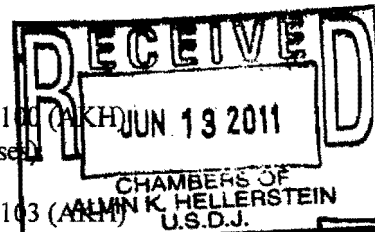


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE WORLD TRADE CENTER DISASTER :
SITE LITIGATION :
-----X
IN RE COMBINED WORLD TRADE CENTER :
AND LOWER MANHATTAN DISASTER SITE :
LITIGATION (straddler plaintiffs) :
-----X

21 MC 100 (AKH)
(All Cases)

21 MC 103 (AKH)
(All Cases)



**NOTICE OF JOINT MOTION TO DISMISS CLAIMS
AGAINST TAYLOR RECYCLING, LLC**

PLEASE TAKE NOTICE that on a day to be determined by this Court, Plaintiffs' Co-Liaison Counsel, Worby Groner Edelman & Napoli Bern, LLP and Attorneys for Defendant, Taylor Recycling Facility, LLC, LLC, Eckert Seamans Cherin & Mellott, LLC, shall apply to the Honorable Alvin K. Hellerstein, U.S.D.J. at the Southern District of New York located at 500 Pearl Street, New York, New York, Room 14-D for Order seeking the dismissal of certain plaintiffs' claims against defendant Taylor Recycling Facility, LLC with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(2).

Dated: New York, New York
June 9, 2011

/s/ Christopher R. LoPalo
Christopher R. LoPalo (CL-6466)
Worby Groner Edelman & Napoli Bern, LLP
350 Fifth Avenue, Suite 7413
New York, New York 10118
(212) 267-3700
Attorneys for Plaintiffs

/s/ Steven R. Kramer
Steven R. Kramer (SRK-2097)
Eckert Seamans Cherin & Mellott, LLC
570 Taxter Road, Suite 275
10 Bank Street, Suite 1061
White Plains, New York 10606
(914) 949-5424
Attorneys for Defendant, Taylor Recycling
Facility, LLC

The joint motion is granted. The originals of the stipulations 3, 4 have been signed and are being docketed. 5-14-11

EXHIBIT 1

EXHIBIT 2

EXHIBIT 3